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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

PEOPLE OF CITY OF LOS ANGELES
WHO ARE UN-HOUSED, AS A
CLASS REPRESENTED BY D.
JACOBS, as representative of a class of
unhoused persons who reside and resided
in the streets and on the sidewalks of the
City of Los Angeles,

Plaintiffs.

v.

KAREN BASS, ERIC MICHAEL
GARCETTI, PAUL KREKORIAN,
ROBERT BLUMENFIELD, NITHYA
RAMAN, KATY YAROSLAVSKY,
IMELDA PADILLA, MONICA
RODRIGUEZ, MARQUEECE-
HARRIS-DAWSON, JOHN LEE,
CURREN PRICE, HEATHER HUTT,
TRACI PARK, HUGO SOTO-
MARTINEZ, KEVIN DE LEON, TIM
Mc OSKER, MONIQUE CONTRERAS,
1"DOE" BROWN, ONE HUNDRED
UNKNOWN NAMED DEFENDANTS,
1-100,

Defendants.

CASE NO. 2:24-cv-09320 DOC (MAAx)
*Assigned to: Hon. Judge David O. Carter, Ronald
Reagan Cthse, Ctrm 10A; Hon. Mag. Maria A. Audero,
Roybal Bldg, Ctrm. 880*

**DECLARATION OF MONIQUE
CONTRERAS IN SUPPORT OF
DEFENDANT MONIQUE
CONTRERAS'S MOTION FOR
SUMMARY JUDGMENT, OR
ALTERNATIVELY, PARTIAL
SUMMARY JUDGMENT**

[Fed. R. Civ. P. 56]

*[Filed concurrently with Notice of Motion for
Summary Judgment; Separate Statement of
Uncontroverted Facts and Conclusion of Law;
Declaration of Eric Melendez w-Exhibits; Request
for Judicial Notice w-Ford Decl and Exhibits;
Notice of Lodging Flashdrive and [Proposed]
Order]*

Date: Julv 14. 2025
Time: 8:30 a.m.
Crtrm.: 10A

Trial Date: Mav 12. 2026
Complaint Filed: October 29, 2024

DECLARATION OF MONIQUE CONTRERAS

I, MONIQUE CONTRERAS, declare as follows:

1. I am employed with the Los Angeles Police Department (“LAPD”) and currently hold the rank of Police Officer III. I am a Defendant in this matter, *People of the City of Los Angeles Who Are Un-Housed, et al. v. Karen Bass, et al.*, Case No. 2:24-cv-09320 DOC (MAAx). I have personal knowledge of the information set forth below, except those things set forth on information and belief, and as to those things, I believe them to be true.

2. On September 2, 2024, my partner, Officer Briana Brown, and I were driving in a marked black and white police SUV. I was wearing a full police uniform and a body-worn camera which captured the incident with David Jacobs.

3. Officer Brown and I observed David Jacobs’s tent erected on a sidewalk within 500 feet of a school in violation of Los Angeles Municipal Code (“LAMC”) section 41.18(e). I recognized Mr. Jacobs’s tent and knew that he previously had been warned, cited, and booked for violating LAMC section 41.18(e).

4. My partner and I parked our police vehicle and exited. We then approached Mr. Jacobs’s tent and asked him to exit his tent.

5. However, Mr. Jacobs opened the flap of the tent and sprayed pepper spray in our direction.

6. Mr. Jacobs, who was wearing only shorts and no shirt, then ran from his tent and continued to pepper spray towards my partner and I as we tried to approach him. I never withdrew my baton from my belt. I did draw my TASER and warned Mr. Jacobs, but I never deployed the TASER probes or activated the TASER.

7. Mr. Jacobs then ran into the street to our police vehicle and pepper sprayed it.

8. We requested back-up via police radio to assist.

9. Mr. Jacobs then fled from the area and we chased him on foot. However,

1 Mr. Jacobs outpaced me, and I was unable to detain him.

2 10. On information and belief, Mr. Jacobs was eventually apprehended and
3 taken into custody by other LAPD Officers. I had no involvement in Mr. Jacobs's
4 physical arrest.

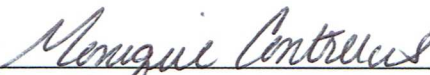
5 11. I did not draw my police baton during the incident, and I did not strike or
6 make physical contact with Plaintiff at any time. My partner, Officer Brown, also never
7 made physical contact with Mr. Jacobs.

8 12. I did not author the arrest report in this incident (Exhibit "1"). I had no
9 involvement in the decision-making as to what charges to arrest Mr. Jacobs on or what
10 criminal charges were filed against Mr. Jacobs. I was not involved in the criminal court
11 process in any manner.

12 13. Exhibit "2" is a true and correct copy of my Body-Worn Camera Video
13 from the September 2, 2024, incident with Mr. Jacobs that is the subject of this matter.

14 I declare under penalty of perjury pursuant to the laws of the United States of
15 America and the State of California that the foregoing is true and correct.

16
17 Executed this 12th day of June, 2025 at Los Angeles, California

18
19 
20 Monique Contreras, Declarant